

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK
MARY VAN BRUNT-PIEHLER,

Plaintiff,

v.

ABSOLUTE SOFTWARE, INC., ABSOLUTE
SOFTWARE CORPORATION, GEOFF HAYDON,
THOMAS KENNY, and TODD AWTRY,

Defendants.

Civil Action No.
16-cv-6313

STATEMENT OF PLAINTIFF'S DAMAGES

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Jonathan Ferris

PLAINTIFF'S DAMAGES

Plaintiff seeks all damages to which she is entitled to under law including, front pay, back pay, compensatory, interest, liquidated, and punitive damages. Plaintiff is also seeking an order of reinstatement, interest, and attorneys' fees and costs. Detailed information regarding plaintiff's calculation of the damages is provided in the Expert Report of Dr. Steven Shapiro which is being contemporaneously identified as a trial exhibit.

Further, plaintiff is seeking tax neutralization due to the negative tax consequences she will experience for receiving back and front pay in a lump sum. *See O'Neill v. Sears, Roebuck & Co.*, 108 F.Supp.2d 443, 446 – 47 (E.D. Pa. 2000).

Dated: July 13, 2021

THOMAS & SOLOMON LLP

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